

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES, et al.,)	
)	
Plaintiffs,)	
v.)	No. 1:23-cv-00108-LMB-JFA
)	
GOOGLE LLC,)	
)	
Defendant.)	

**SUPPLEMENT TO PLAINTIFFS’ MOTION FOR AN ADVERSE
INFERENCE TO CORRECT CERTAIN EXHIBITS**

Plaintiffs make the following corrections to one exhibit and two appendices filed with their Motion for an Adverse Inference, ECF No. 1115:

1. Prabhakar Raghavan was erroneously listed as a trial witness in Appendix B, Appendix C, and two slipsheets within Exhibit 4, but should only have been listed as a custodian, as he does not appear on any party’s witness list.
2. Plaintiffs’ Appendix C contained incorrect numbers in the “Ex. #” column.

Plaintiffs are submitting in a separate filing under seal¹ corrected versions of Appendix B, Appendix C, and the two slipsheets from Exhibit 4 that no longer denote Mr. Raghavan as a trial witness and contain correct numbering in the “Ex. #” column of Appendix C.

¹ In its response to Plaintiffs’ motion to seal documents filed with their Motion for an Adverse Inference, Google does not request continued sealing of Appendix B, Appendix C, or Exhibit 4. ECF No. 1148. Plaintiffs file these corrected documents under seal in accordance with the Court’s August 6, 2024 Order directing that they “be maintained under seal by the Clerk, until otherwise directed.” ECF No. 1134.

Dated: August 14, 2024

Respectfully submitted,

JESSICA D. ABER
United States Attorney

/s/ Gerard Mene
GERARD MENE
Assistant U.S. Attorney
2100 Jamieson Avenue
Alexandria, VA 22314
Telephone: (703) 299-3777
Facsimile: (703) 299-3983
Email: Gerard.Mene@usdoj.gov

/s/ Julia Tarver Wood
JULIA TARVER WOOD
MATTHEW HUPPERT
KATHERINE E. CLEMONS

United States Department of Justice
Antitrust Division
450 Fifth Street NW, Suite 7100
Washington, DC 20530
Telephone: (202) 307-0077
Fax: (202) 616-8544
Email: Julia.Tarver.Wood@usdoj.gov

Attorneys for the United States

JASON S. MIYARES
Attorney General of Virginia

/s/ Tyler T. Henry
TYLER T. HENRY
Assistant Attorney General

Office of the Attorney General of Virginia
202 North Ninth Street
Richmond, VA 23219
Telephone: (804) 692-0485
Facsimile: (804) 786-0122
Email: thenry@oag.state.va.us

Attorneys for the Commonwealth of
Virginia and local counsel for the
States of Arizona, California,
Colorado, Connecticut, Illinois,
Michigan, Minnesota, Nebraska, New
Hampshire, New Jersey, New York,
North Carolina, Rhode Island,
Tennessee, Washington, and West
Virginia